		Special Master's Proposed	Special Master's Proposed Construction of Disputed Terms	[erms	
Actual Claims	Crossroads' Proposed	Crossroads'	Defendants' Proposed	Defendants'	Special Master's
Language	Construction	Evidence	Construction	Evidence	Construction
		Hr'g Tr. at 81:12-15,			
		March 8, 2011 (all			
		parties agree that the			
		Petal, Spring and Oeda			····
		references disclose			
		systems with a "server"			
		interposed between			
		workstations and			
		storage devices); Id. at			
		88:2-89:16; 93:4-7;			
		100:16-24 (Defendants			
		agree that the			
		"translation"			
		distinguished by			
		patentees during			
		reexamination was from			1
		high level file system			
		commands into NLLBP			
		requests); Id. at 89:11-16			
		(parties agree that			
		"allowing access			
		using NLLBP" occurs			
		without a translation			
		from a high level file			
		system command to a			
		91:14-16, 92:1-5, 152:4-			
		7 (Defendants concede			
		that the "network			
		protocols" described in			
		the Oeda, Petal and			
		Spring references			
		included file system			
		commands thus,			
		including "without			
		involving network			
		2.00+0.0010"; g guarantinous			

		Special Master's Proposed	Special Master's Proposed Construction of Disputed Terms		
Actual Claims Language	Crossroads' Proposed Construction	Crossroads' Evidence	Defendants' Proposed Construction	Defendants' Evidence	Special Master's Construction
		to "without involving a			
		translation from a high			
		level file system			
		command to a native low			
		level block protocol			
		request.")			
		April 28, 2011 2d Supp.			
		Decl. of John Levy,			
		Ph.D., ¶7 (CIFS, NFS			
		and FTP are network			
		protocols).			
		March 7, 2011 Decl. of			
		Brian Berg, ¶37			
		(Defendants' expert uses			
		term "network protocol"			
		broadly such that it			
		would include Fibre			
		Channel).			
		April 28, 2011 2d Supp.			
		Decl. of John Levy,			
		Ph.D., ¶6 (under			
		Defendants'			
		construction, a protocol			
		used for communication			
		over "Fibre Channel			
		based networks" would			
		be a network protocol).			
		February 22, 2011 Decl.			
		of John Levy, Ph.D., ¶¶			
		31, 33 (NLLBPs do not			
		have the overhead			
		of higher level protocols			

		Special Master's Proposed	Special Master's Proposed Construction of Disputed Terms	Terms	
Actual Claims Language	Crossroads' Proposed Construction	Crossroads' Evidence	Defendants' Proposed Construction	Defendants' Evidence	Special Master's Construction
		to access storage); Id. ¶ 34 (specification describes network servers communicating with storage using NLLBPs).			
Claim 35: The system of claim 34,	Configuration:	Configuration:	Configuration:	See claim 1, supra.	No Construction
wherein the supervisor unit is further operable to:	"A modifiable setting of information."	Intrinsic:	"Map"; otherwise indefinite.		inecessary.
maintain a configuration that		Col. 2, II. 19-23; Col. 5, II. 53-54; Col. 6, II. 58-			
maps from the host device to a virtual		64 (describing "configuration" as			
representation of at least a portion of the		information used to control operation of the			
storage space on the storage device to the		storage router and which is modifiable).			
storage device; and allow the host device to		'147 Patent: Col. 2. II.			
access only that portion		28-32; Col. 9, II. 36-41	4		
that is contained in the		include mapping			
		additional information,			
		such as information needed to "implement[]			
		access controls").			
		Claim 15, Col. 11, II. 23-28 (the limitation			
		"operable to maintain a			
		configuration wherein the configuration			
		includes a map"			

		Case 1:10-cv-00652-SS Document 167-20 Filed	80	<u>/10</u> /	′11 F	Page	<u>4 of</u>	<u>10</u>	
	Special Master's Construction			No Construction	recessary.				
Terms	Defendants' Evidence			See claim 1, supra.					
	Defendants' Proposed Construction			Configuration:	"Map"; otherwise indefinite.				
Special Master's Proposed Construction of Disputed	Crossroads' Evidence	would be meaningless under Defendants' proposed construction).  Extrinsic:  Chaparral Markman Order at 16, Fore Decl. ISO Crossroads' Cl. Const. Br., Ex. L (parties to earlier action agreed to construe "maintain a configuration" to mean "keeping a modifiable setting of information"); February 22, 2011 Decl. of John Levy, Ph.D., ¶46 (person of ordinary skill would understand "maintaining a configuration" to mean "keeping a modifiable set of information").		Configuration:	Intrinsic:	Col. 2, II. 19-23; Col. 5, II. 53-54; Col. 6, II. 58-	64 (describing "configuration" as	information used to	storage router and which is modifiable).
3	Crossroads' Proposed Construction			Configuration:	"A modifiable setting of information."				
	Actual Claims Language		Claim 36:	The system of claim 35,	configuration comprises a map from a host device	ID to a virtual LUN representation of the	storage device to a physical LUN of the	storage device.	

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Special Master's	Construction																																		
erms Defendants'	Evidence																																		
Special Master's Proposed Construction of Disputed Terms  Crossroads' Defendants' Proposed	Construction																																		
pecial Master's Proposed Crossroads'	Evidence	'147 Patent: Col. 2. II.	28-32; Col. 9, II. 36-41	("configuration" can also	include mapping	information and	additional information.	such as information	needed to "implement[]	access controls").		Claim 15, Col. 11, II. 23-	28 (the limitation	"operable to maintain a	configuration wherein	the configuration	includes a map"	would be meaningless	under Detendants	proposed construction).	Extrinsic:	Chaparral Markman	Order at 16, Fore Decl.	ISO Crossroads' Cl.	Const. Br., Ex. L (parties	to earlier action agreed	to construe "maintain a	configuration" to mean	"keeping a modifiable	setting of information");	February 22, 2011 Decl.	$\sim$	(person of ordinary skill	would understand	"mointoining o
Crossroads' Proposed	Construction																					"													
Actual Claims	Language		-																																

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Defendants' Evidence			W S
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Special Master's Proposed Construction of Disputed Terms  Crossroads' Defendants' Proposed  Evidence Construction			
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Master's P <sub>1</sub> Crossroads Evidence	n" to 1 nodifi lation		
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cial [	configuration" to mean "keeping a modifiable set of information").		
	<u> </u>		7 (1986) 7 (1986)
Crossroads' Proposed Construction		[No claim term at issue] [No claim term at issue]	
ssroads' Prop Construction		No claim term at issu No claim term at issu	
road		aim term	
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ms		The system of claim 34, wherein the storage device further comprises storage space partitioned into virtual local storage for the host device.  Claim 38:  The system of claim 37, wherein the supervisor unit is further operable to prevent the host device from accessing any storage device that is not part of a virtual local storage device that is not part of a virtual local storage partition assigned to the host device.  Claim 39:  The system of claim 37, wherein the supervisor unit is further operable to prevent the host	any storage on the storage device that is not part of a virtual local storage partition assigned to the host device.
Actual Claims Language		of classions storage er cor e part ocal s device ocal s a super er cor ce that a ce that on the ce that on the ce that or ce that or ce that a ce that or ce that a ce that or c	on the ce that ual lo tion he ho
ctual Lang		stem n the furth s spac furth s spac furth furthe ent th from vrage a virt parti d to t stem n the furthe ent th from n the furthe ent th	rrage reage a device a virt
¥	Ooim 37	The system of claim 34 wherein the storage device further comprise storage space partitions into virtual local storage for the host device.  Claim 38:  The system of claim 37 wherein the supervisor unit is further operable to prevent the host device from accessing any storage on the storage device that is no part of a virtual local storage partition assigned to the host device.  Claim 39:  The system of claim 37 wherein the supervisor unit is further operable to prevent the host device from accessing	any storage on the storage device that is part of a virtual local storage partition assigned to the host device.
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## TABLE OF CITATION ABBREVIATIONS

Exhibit No. or Range			Jt. Ex. 101-114			A-FF		A-F		A-L	P-1 to P-37		A-J	
Date	aterials	3/08/2011		igs and Exhibits	2/22/2011		2/22/2011		3/07/2011			4/29/2011		4/28/2011
Document(s)	Joint Materials	Transcript of <i>Markman</i> Hearing before the Honorable Karl Bayer, Jr.	Markman Hearing Joint Exhibits	Plaintiff's Pleadings and Exhibits	Plaintiff Crossroads Systems Inc.'s Markman Brief	Exhibits to Declaration of Elizabeth Brown Fore dated 2/22/2011 (in support of Plaintiff's brief)	Declaration of John Levy, Ph.D.	Exhibits to Declaration of John Levy, Ph.D.	Supplemental Declaration of John Levy, Ph.D.	Exhibits to Supplemental Declaration of John Levy, Ph.D.	Crossroads' Markman Hearing Exhibits	Plaintiff Crossroads Systems Inc.'s Post-Hearing Markman Brief	Exhibits to Declaration of Elizabeth Brown Fore dated 4/29/2011 (in support of Plaintiff's posthearing brief)	Second Supplemental Declaration of John Levy, Ph.D.
Abbreviation		Hrg. Tr.	Jt. Ex.	. *	Pl. Br.	Pl. Br. Ex.	Levy Decl.	Levy Ex.	Levy Supp.	Levy Supp. Ex.	Pl. Hrg. Ex.	PI. PHB	PI. PHB Ex.	Levy 2 <sup>nd</sup> Supp.

Abbreviation	Document(s)	Date	Exhibit No. or Range
Levy 2 <sup>nd</sup> Supp. Ex.	Exhibits to Supplemental Declaration of John Levy, Ph.D.		A-D
PI. RPHB	Plaintiff Crossroads Systems Inc.'s Reply Post-Hearing Brief	5/13/2011	
	Defendants' Plea	Defendants' Pleadings and Exhibits	
Def. Br.	Brief in Support of Defendants' Proposed Claim Constructions	2/22/2011	
Def. Ex.	Exhibits to Declaration of George W. Webb III (to accompany Defendants' brief) (also entered as Defendants' hearing exhibits)	2/22/2011	Def. Ex. 1-22
Berg Decl.	Declaration of Brian A. Berg	3/07/2011	
Berg App.	Appendices to Declaration of Brian A. Berg		Berg. App. A-J
Def. PHB	Defendants' Post-Hearing Brief on Issues of Claim Construction	4/29/2011	
Def. PHB Ex.	Exhibits to Declaration of George W. Webb III (to accompany Defendants' brief)	4/29/2011	Def. Ex. 23-24
Def. RPHB	Defendants' Reply Post-Hearing Brief on Issues of Claim Construction	5/13/2011	
	Frequently Ci	Frequently Cited Documents	
'035 patent	U.S. Pat. 6,425,035	7/23/2002	Jt. Ex. 101
'147 patent	U.S. Pat. 7,051,147	5/23/2006	Jt. Ex. 102
First Reexam Reply	'035 file history, Reply to Office Action Under Ex Parte Reexamination Dated 2/07/2005	4/06/2005	Def. Ex. 6

Abbreviation	Document(s)	Date	Exhibit No. or Range
Second Reexam Reply	'035 file history, Reply to Office Action Under Ex Parte Reexamination Dated 5/24/2005	7/22/2005	Def. Ex. 7
'147 Reply	'147 file history, Reply to Office Action Dated 1/27/2005	7/27/2005	Def. Ex. 9
Horst Decl.	Declaration of Robert W. Horst and exhibits in <i>Crossroads v. Postvision</i> (W.D. Tex. case 1:10-cv-00652-SS)	5/20/2010	Def. Ex. 16